

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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UNITED STATES OF AMERICA,  
and the STATE OF TENNESSEE *ex*  
*rel.* DR. L. DARRYL QUARLES,

Plaintiffs,

Civil No.: 16-2733-JTF-dkv

v.

SATELLITE HEALTHCARE, INC., UT  
MEDICAL GROUP, INC., and WELL-  
BOUND OF MEMPHIS, LLC,

Defendants.

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UNITED STATES' AND STATE OF TENNESSEE'S NOTICE OF INTERVENTION  
FOR PURPOSES OF SETTLEMENT

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Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), and the Tennessee Medicaid False Claims Act, Tenn. Code Ann. § 71-5-183(b)(2) and (4), the United States and the State of Tennessee notify the Court of their decision to intervene in this *qui tam* action for purposes of settlement. The United States, the State of Tennessee, Relator, and Defendant Well-bound of Memphis, LLC have executed a settlement agreement resolving all matters.

Under the terms and conditions of the settlement agreement among the parties, the United States, the State of Tennessee and Relator will file a Notice of Dismissal with respect to all claims in this action upon receipt of the settlement funds which are due within 60 days of the effective date of the settlement agreement.

In light of the settlement agreement reached among the parties, the United States and the State of Tennessee do not presently intend to file a complaint in intervention but reserve the right

to seek leave to file such a complaint in the event that Defendant Wellbound of Memphis, LLC does not comply with the terms of the settlement agreement.

Finally, the United States and the State of Tennessee hereby request that the Court unseal Relator's Complaint, this Notice of Intervention, and all subsequent filings following this Notice of Intervention. The United States and the State of Tennessee respectfully request that all other filings in this matter remain under seal and not be made public (including, but not limited to, any applications for extensions of the sixty-day investigative period, any applications for partial lifting of the seal, and any orders previously entered in this matter). A proposed order is filed herewith.

Respectfully submitted,

D. MICHAEL DUNAVANT  
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Notice was sent via email and/or U.S. mail this 29th day of January, 2019, to the following:

Jerry E. Martin  
Seth M. Hyatt  
Barrett Johnston Martin & Garrison, LLC  
Bank of America Plaza  
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Because this action is under seal, Defendants have not been served with copies of the foregoing Joint Notice, pending the unsealing of this matter.

s/ Stuart J. Canale  
Assistant United States Attorney